

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

AMIR HEKMATI,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 19-1766C
	)	(Judge Hertling)
THE UNITED STATES,	)	
	)	
Defendant.	)	

DEFENDANT'S MOTION FOR LEAVE TO FILE UNDER SEAL

Pursuant to Rule 7(b) and Appendix E to the Rules of the United States Court of Federal Claims (RCFC), defendant, the United States, respectfully requests leave from the Court to file defendant's appendix to its motion to dismiss or, in the alternative, motion for summary judgment under seal.

Defendant was prepared to file the appendix simultaneously with our brief, but contacted counsel for plaintiff before filing because certain information in defendant's appendix had previously been filed by plaintiff under seal in a separate matter and was provided by plaintiff to the Special Master in the administrative proceedings on a confidential basis. Counsel for plaintiff requested that certain sensitive information that had been previously filed under seal and not made public only be filed under seal in this matter. We have provided a copy of defendant's appendix to plaintiff today.

If amenable to the Court, defendant proposes filing the entire appendix under seal and filing a redacted copy of the appendix no later than March 10, 2021, after plaintiff has had an opportunity to review the appendix and identify the specific information that he proposes should be redacted from the public filing.

Respectfully submitted,

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